

LAW OFFICES OF ROBERT G. STAHL, LLC

ROBERT G. STAHL♦

LAURA K. GASIOROWSKI•‡

ANDREW OLESNYCKY♦•

• Also Admitted in NY

‡ Also Admitted in LA

♦ CERTIFIED BY THE SUPREME COURT
OF N.J. AS A CRIMINAL TRIAL ATTORNEY

WRITER'S E-MAIL:
RSTAHL@STAHLESQ.COM

December 13, 2019

Via ECF

Hon. Paul A. Crotty, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street,
New York, New York 10007

Re: U.S. v. John DeFalco, Case No. 19-cr-472

Judge Crotty:

This letter is a request a Modification to Mr. DeFalco's Conditions of Release to remove the curfew from 4 a.m. -10 p.m. with electronic monitoring and to extend his permitted travel to Connecticut so that he may regularly visit his daughter who attends college in Connecticut.

AUSAs McKay and Schaeffer do not object to the proposed modifications. Pretrial Services also has no objection.

Respectfully submitted,

/s Robert G. Stahl, Esq.

Robert G. Stahl, Esq.

cc: AUSA Jarrod Schaeffer (via ECF)
 AUSA Thomas McKay (via ECF)
 PTS Officer John Moscato (via ECF)
 PTS Officer Vincent Imbrosiano (via email)

53 CARDINAL DRIVE, 3RD FLOOR, WESTFIELD, NJ 07090
P 908.301.9001/F 908.301.9008
WWW.STAHLESQ.COM

NY OFFICE: 52 DUANE STREET, 7TH FLOOR, NEW YORK, NY 10007